

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA

LAURIE GARLAND, )  
 )  
Plaintiff, )  
 )  
vs. ) No. CIV-2020-306-RAW  
 )  
STATE OF OKLAHOMA ex rel )  
OKLAHOMA DEPARTMENT OF )  
CORRECTIONS, CHRISTOPHER )  
REDEAGLE, Individually, )  
SHARON McCOY, Individually, )  
JOE ALLBAUGH, Individually, )  
PENNY LEWIS, Individually, )  
RABEKAH MOONEYHAM, )  
Individually, HEATHER )  
CARLSON, Individually and )  
BOARD OF CORRECTIONS, )  
 )  
Defendants. )

\* \* \* \* \*

DEPOSITION OF SHARON McCOY

TAKEN ON BEHALF OF THE PLAINTIFF

IN MCALESTER, OKLAHOMA

ON AUGUST 25, 2022

\* \* \* \* \*

\*\*\*\*\*ALL EXHIBITS ARE CONFIDENTIAL  
AND SUBJECT TO PROTECTIVE ORDER\*\*\*\*\*

1 Q You believe that Deputy Warden Redeagle did  
2 the things that are alleged in here; is that correct?

3 A That's correct.

4 Q One of those things is he was, in your mind,  
5 mailing letters or cards to Inmate Garland; is that  
6 correct?

7 A That's correct.

8 Q And is that a clear violation of DOC policy?

9 A Yes.

10 Q Would that be considered an inappropriate  
11 relationship with an inmate?

12 A Yes.

13 Q Should there have been any doubt in any DOC  
14 staff member's mind that that was not allowed?

15 MS. WILKES: Object to form.

16 THE WITNESS: Should there be any doubt? In  
17 any DOC's -- there should be no doubt.

18 Q (By Mr. Dalton) Very good. Deputy Warden  
19 Redeagle was talking or having intimate relationships  
20 beyond just a working relationship in this report. Was  
21 that a violation of DOC protocols, rules and  
22 regulations?

23 A Yes.

24 Q And again, there should be no doubt in any  
25 DOC staff member that that was not allowed; correct?

1 identification purposes)

2 Q (By Mr. Dalton) Okay. I'm going to hand you  
3 what I've marked as Plaintiff's Exhibit No. 8. I'm  
4 going to represent to you that this is a picture of  
5 Ms. Garland. Do you see that?

6 A Yes. I see it.

7 Q Does it appear that's laid out on the same  
8 comforter as the other ones we've just gone over?

9 A It appears to be the same comforter.

10 Q If Investigator Knight testified that this  
11 was a photograph of Inmate Garland in the possession or  
12 the car or the residence of Deputy Warden Redeagle,  
13 would you have any reason to dispute that?

14 A No.

15 Q You don't have any independent knowledge of  
16 this actual photograph, do you?

17 A No.

18 Q These Exhibits, 2 through 8, should not have  
19 been in Deputy Warden Redeagle's possession. Do you  
20 agree?

21 A I agree.

22 Q If you had knowledge of any of these things,  
23 2 through 8, being in Deputy Warden Redeagle's  
24 possession prior to this, what would you have done?

25 A I would have put him on leave.

1           Q       And put him on leave. Does that mean he  
2 would have been removed from the Eddie Warrior  
3 Correctional Facility?

4           A       Yes. And I would have contacted my  
5 supervisor and notified her of the issue. And I would  
6 have issued a memorandum from my office that he was not  
7 allowed on the premises.

8           Q       Would you have done that to protect Inmate  
9 Garland?

10          A       Yes.

11          Q       And if just any one of these had been found,  
12 not all 2 through 8, but just any one of these, would  
13 that have been enough to have those actions taken?

14          A       Yes.

15          Q       In your mind these are serious violations;  
16 correct?

17          A       Yes.

18          Q       Under Oklahoma Department of Corrections  
19 policy, is this considered abuse or sexual misconduct  
20 towards an inmate?

21          A       Yes.

22                 MS. WILKES: Counsel, we've been going for  
23 about an hour. How are you feeling? I didn't want to  
24 interrupt a line of questioning. Do you think this is a  
25 good breaking point?

1 I need more budget for this or that. Or if you wanted  
2 something updated, would she have been the one to go to?

3 MS. WILKES: Object to form.

4 THE WITNESS: I don't understand the question.  
5 Are you talking about --

6 Q (By Mr. Dalton) If you had wanted more video  
7 monitoring at Eddie Warrior Correctional Facility, would  
8 you have talked to Penny Lewis about that or somebody  
9 different?

10 A No. My supervisor.

11 Q Penny Lewis, was she contacting you regarding  
12 failures or areas of concern that she was seeing with  
13 the Eddie Warrior Correctional Facility?

14 A If there was something that they noticed or  
15 noted in the audit, yes.

16 Q So I can see where they would contact you  
17 after the audit. But would you have any reason to  
18 contact them outside of the audit?

19 A No. Not her office. No.

20 Q And as a compliance officer, was she in  
21 charge of making sure that you were complying with PREA  
22 and sanitation and medical and just the running of the  
23 Eddie Warrior Correctional Facility?

24 A Yes.

25 MS. WILKES: Object to form.

1 A No.

2 Q Let's look at the third one in, 5935. You  
3 see the bottom? There's a Bates stamp? It says, with a  
4 special friend who means so much. Do you see that?

5 A Yes.

6 Q And it says, you're truly special to me and  
7 always will be. There's no dispute that's just  
8 inappropriate; correct?

9 A Yes.

10 Q That violates PREA; is that correct?

11 A Yes.

12 Q That's the Prison Rape Elimination Act?

13 A Yes.

14 Q This is basic knowledge that any person  
15 working for the Department of Corrections should be  
16 aware of; correct?

17 A Yes.

18 Q You've reviewed these. Do any of these look  
19 like they would be appropriate for a deputy warden to  
20 send to an inmate?

21 A No.

22 Q You don't know the time period that any  
23 letters were sent from Deputy Warden Redeagle to Inmate  
24 Garland, do you?

25 A No.

1           Q       Let's look at the very last one. I don't  
2       want to spend a lot of time on these, but let's just  
3       look at the last one. You see the third paragraph down  
4       that says, I know that?

5           A       Uh-huh.

6           Q       Can you just read what it says?

7           A       I know that you can't take my letters, notes  
8       and my mementos home with you.

9           Q       Do you know what -- I'm sorry. That's good.  
10       And it goes on. But do you know what mementos he's  
11       referring to?

12          A       No. I have no clue.

13          Q       Would that be the underwear?

14                   MS. WILKES: Object to form.

15                   THE WITNESS: I don't know.

16          Q       (By Mr. Dalton) Letters, notes, mementos  
17       obviously clearly violate the Prison Rape Elimination  
18       Act; correct?

19          A       Yes.

20          Q       Do you know of anything else that Deputy  
21       Warden Redeagle would have given to Inmate Garland?

22          A       No.

23          Q       We are aware of some letters, of underwear.  
24       Is there anything else that you're aware of that he gave  
25       her?

1           Q       And then who -- it was chief of security, was  
2   it Mr. Cox; is that right?

3           A       Yes.

4           Q       Is it Brian Cox?

5           A       Brian Cox.   Yes.

6           Q       Is he the one that would have interviewed the  
7   inmates?

8           A       Yes.

9           Q       Do you know what inmates he interviewed?

10          A       No.   I don't remember.

11          Q       Do you remember how many he was supposed to  
12   interview or anything to that?

13          A       I don't remember.

14          Q       What would you have expected?   Like, four or  
15   five?   Everybody in her pod?

16          A       Yeah.   Probably.

17          Q       Is there --

18          A       As many as it took.   It didn't necessarily  
19   have to be on her pod either.   It could have been  
20   inmates that was in the building where she worked at, I  
21   mean.

22          Q       So you would have expected him to interview  
23   several inmates anyway?

24          A       Yeah.   Depending on where the inmates lived  
25   at and where they worked.

1           Q       Are you looking for people that would have  
2       had a connection to Ms. Garland or seen her working?

3           A       Yes.

4           Q       What about staff? How many staff would you  
5       have expected him to interview?

6           A       Every staff member that had -- that was  
7       connected saw her or dealt with her or had any dealings  
8       at all with Ms. Garland.

9           Q       So that would have been anybody wherever this  
10      coffee, Area 8, they would have all been interviewed?

11          A       Yes. In that area. Yes.

12          Q       Anybody to deal with property, I guess, would  
13      have been interviewed?

14          A       What do you mean property?

15          Q       Seems like they were going in and out of the  
16      property room with some regularity.

17          A       At this point we didn't have -- I mean,  
18      nobody --

19          Q       So this would have been any staff members  
20      that were with Mr. Redeagle or wherever this coffee type  
21      area was?

22          A       Yes.

23                   MS. WILKES: Object to form.

24          Q       (By Mr. Dalton) Was there any thought to  
25      tailing or watching Deputy Warden Redeagle? Or did

1 correct?

2 A Yes.

3 MS. WILKES: Object to form.

4 THE WITNESS: Except for -- everything that  
5 I've heard is pure hearsay. Again, we are talking about  
6 a rumor but we still would have looked into it. So she  
7 specifically named the deputy warden and what her  
8 concerns were.

9 Q (By Mr. Dalton) This could have prompted an  
10 outside investigation to be brought in, if you had  
11 wanted to?

12 MS. WILKES: Object to form.

13 THE WITNESS: Yes.

14 MR. KELLER: I don't think she answered that  
15 verbally. I don't know whether she did or not. Just  
16 shook her head.

17 MR. DALTON: That's fine.

18 Q (By Mr. Dalton) I'm just going to ask you  
19 the same question again.

20 A Okay.

21 Q Exhibit No. 12 could have justified you  
22 bringing in an outside investigation; correct?

23 MS. WILKES: Same objection.

24 THE WITNESS: Yes.

25 Q (By Mr. Dalton) I did not hand you 13 yet

1 Cooper for doing that, do you?

2 A No.

3 Q Would this have been enough for you to turn  
4 it over to an outside investigator or not?

5 MS. WILKES: Object to form.

6 THE WITNESS: Yes.

7 Q (By Mr. Dalton) And why?

8 A Because this was April, 2019. If something  
9 keeps coming up, even though you didn't find anything  
10 the first time, then you go ahead and make sure.

11 Q (By Mr. Dalton) If you guys had been aware  
12 of Julia Woolsey, that's an inmate; correct?

13 A Uh-huh.

14 Q If during the March investigation, if her  
15 name had come up or you guys had been aware of Julia  
16 Woolsey, would you guys have questioned her?

17 MS. WILKES: Object to form.

18 THE WITNESS: If she would have reported or --  
19 is that what you're asking if she would have reported  
20 this back in -- is that the question?

21 Q (By Mr. Dalton) No. My question's a little  
22 different. Would you have talked to -- March 18th,  
23 Chief of Security Cox, it looks like, talked to Inmate  
24 Garland, and you talked to Deputy Warden Redeagle. If  
25 during that time somebody had brought up the name of

1 Julia Woolsey, Inmate Julia Woolsey, would you have or  
2 Chief of Security Cox, would somebody have investigated  
3 Julia Woolsey further at that point in time?

4 MS. WILKES: Object to form.

5 THE WITNESS: We would have gotten a statement  
6 from her. Yes.

7 Q (By Mr. Dalton) And if she had provided this  
8 information to you and Ms. Woolsey, you would have  
9 called in an outside investigate or not?

10 MS. WILKES: Object to form.

11 THE WITNESS: Yes. We would have written it  
12 up and requested an investigation.

13 Q (By Mr. Dalton) Do you have any reason to  
14 dispute what's written in Exhibit No. 15?

15 A No.

16 Q And in hindsight is there anything she said  
17 in here that you believe is incorrect or not true?

18 A I don't know. I wasn't there. But it -- I'm  
19 sorry. Can you ask that question again?

20 Q Do you have any reason to dispute anything  
21 that was written in Exhibit Number 15?

22 A No.

23 Q Crystal Covalt, is that an inmate or do you  
24 know?

25 MS. WILKES: Object to form.

1 posted. We do orientation with new arrival inmates  
2 regardless of if they've already been to a facility and  
3 gone through the same orientation. Every inmate gets  
4 that same orientation from the new facilities. Sexual  
5 harassment is discussed. They have a chance to ask  
6 questions.

7 Q (By Mr. Dalton) So I guess my question is  
8 after there's a complaint made on March 13th, 2019, by  
9 Ms. Estes, what actions were taken by the DOC to protect  
10 the Plaintiff from any further sexual abuse after that?

11 MS. WILKES: Object to form.

12 THE WITNESS: When the complaint is made and  
13 the investigation starts, the inmate is kept separate  
14 from the alleged perpetrator.

15 Q (By Mr. Dalton) So you would have separated  
16 her from Deputy Warden Redeagle?

17 A Yes.

18 Q Anything else done to protect her?

19 A Like?

20 Q Remove staff, work reassignment, facility  
21 changes, or anything -- any of that done?

22 A Remove Redeagle from the area or from the  
23 facility.

24 Q Did you ever review or see any video footage  
25 of Deputy Warden Redeagle and Inmate Garland that you

1           A       I don't believe any other staff member played  
2   a part.

3           Q       Until he resigned, you agree that Redeagle  
4   still had control over Garland and still had friends at  
5   the Department of Corrections?

6                   MS. WILKES: Object to form.

7                   THE WITNESS: I don't know about his friends.  
8   But he was removed from the facility. So no. I don't  
9   believe.

10          Q       (By Mr. Dalton) Up until he was removed  
11   though, did he still have some control over Inmate  
12   Garland and/or connections at the Eddie Warrior  
13   Correctional Facility?

14                   MS. WILKES: Object to form.

15                   THE WITNESS: Yes.

16          Q       (By Mr. Dalton) Has a staff and inmate's  
17   sexual relationship or sexual misconduct ever happened  
18   before while you were warden?

19          A       Repeat the question.

20          Q       While you've been warden at the Department of  
21   Corrections has there been a staff/inmate sexual  
22   relationship or sexual misconduct occurred?

23          A       Yes.

24          Q       Many times?

25          A       On occasions. Yeah.